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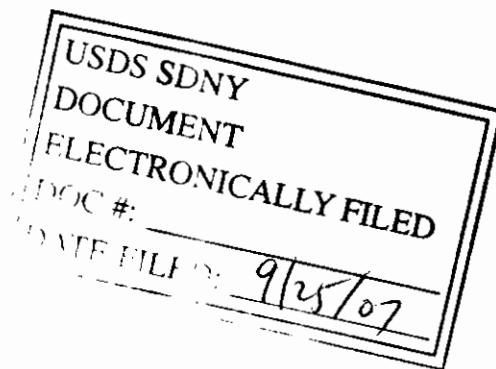
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Septcmber 25, 2007

*Via Email: Eileen\_Levine@nysd.uscourts.gov (with permission)*

Hon. Richard J. Sullivan  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street, Room 920  
New York, NY 10007



Re: Centauri Shipping Ltd. v. Western Bulk Carriers KS

Case no.: 07 Civ 4761 (RJS)  
Our ref.: 07-1132

Dear Judge Sullivan:

We represent the Defendant, Western Bulk Carriers KS ("WBC"), in the above-captioned matter. As your Honor will recall, together with Plaintiff's counsel we participated in a teleconference last Tuesday, September 18, 2007, while the undersigned was overseas on business. The conference call resulted in a schedule being agreed between the Court and counsel for WBC to submit opposition papers in response to Plaintiff's Motion to Stay the Court's Order vacating maritime attachment, etc. The agreed schedule called for WBC to submit its opposition papers by tomorrow, September 25, 2007.

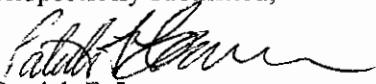
Upon returning to New York on the afternoon of Friday, September 21, 2007, the undersigned received an email from Plaintiff's counsel serving copies of "supplemental" declarations and annexed exhibits in further support of Plaintiff's Motion to Stay. WBC objects to the Plaintiff's "supplemental" pleadings on the basis that: (a) they were unauthorized and submitted without the Court's permission; (b) Plaintiff never sought WBC's consent to file such pleadings; and (c) they have prejudiced WBC by creating a confused record and further compressed WBC's time to submit opposition papers on the Motion to Stay.

Plaintiff's unilateral decision to submit "supplemental" pleadings, *prior* to WBC even filing its opposition papers, completely ignores the motion schedule agreed upon during the September 18, 2007 teleconference and flouts normal motion practice rules. Accordingly, WBC respectfully requests that the Court exercise its discretion and deny the Plaintiff's Motion to Stay for this reason alone. WBC believes this is an especially appropriate remedy given Plaintiff's

prior conduct in this case in violation of WBC's due process rights in applying for and obtaining the original Ex Parte Order providing for the unwarranted and wrongful attachment of WBC's property in excess of \$15 million.

Alternatively, WBC requests a minimum of one (1) additional day to submit its papers in opposition to the Motion to Stay, i.e. that its time be extended from tomorrow until Thursday, September 27, 2007 at 5:00 p.m. In addition, WBC requests that Plaintiff be prohibited from submitting any further "supplemental" pleadings and/or any reply pleadings on the Motion to Stay.

Respectfully submitted,

  
Patrick F. Lennon

PFL/bhs  
Attachment

cc: Via email: klyons@lyons-flood.com  
Lyons & Flood LLP  
Attn: Kirk M. Lyons, Esq.

Defendants  
are to submit  
opposition papers  
by Thursday,  
September 27, 2007  
at 5pm. Plaintiffs  
are to submit no  
additional papers  
in connection with  
the instant motion  
without permission  
from the court.  
Sealed.

  
Richard R. Blum  
U.S.D.T.  
9/25/07